
From: [Kim, Danbee \(USACAC\)](#)
To: [Amy Jacks](#)
Cc: [windsorlaw@gmail.com](#); [Ng, Kellye \(USACAC\)](#); [Park, Wilson \(USACAC\)](#)
Subject: RE: [EXTERNAL] RE: Proposed Jury Instructions
Date: Tuesday, September 16, 2025 12:31:54 PM

Hi Amy,

After consulting with our Office, we do not believe a stay of the proceedings is necessary while the motion to dismiss is being litigated. Please note our opposition in any ex parte request.

Given that our filing deadlines are on Monday, please let us know when you can meet and confer on our proposed jury instructions, verdict form, and statement of the case.

Much appreciated,

Danbee

From: Amy Jacks <amyejacks@sbcglobal.net>
Sent: Monday, September 15, 2025 6:57 PM
To: Kim, Danbee (USACAC) <Danbee.Kim2@usdoj.gov>
Cc: windsorlaw@gmail.com; Ng, Kellye (USACAC) <Kellye.Ng@usdoj.gov>; Park, Wilson (USACAC) <Wilson.Park@usdoj.gov>
Subject: Re: [EXTERNAL] RE: Proposed Jury Instructions

Thanks Danbee.

Who are “your folks”?

Why don’t we wait to hear what they tell you to do before we schedule any meet and confers.

Sincerely,

Amy

Sent from my iPhone

On Sep 15, 2025, at 8:32 PM, Kim, Danbee (USACAC) <Danbee.Kim2@usdoj.gov> wrote:

Hi Amy,

We are consulting with our folks handling the litigation and will get back to you.

In the interim, please find attached our proposed verdict form and statement of the case.

Also, confirming a meet and confer call this Friday, 9/19. How's 11 AM?

Thank you,
Danbee

From: amyejacks@sbcglobal.net <amyejacks@sbcglobal.net>
Sent: Monday, September 15, 2025 3:02 PM
To: Park, Wilson (USACAC) <Wilson.Park@usdoj.gov>; windsorlaw@gmail.com
Cc: Kim, Danbee (USACAC) <Danbee.Kim2@usdoj.gov>; Ng, Kellye (USACAC) <Kellye.Ng@usdoj.gov>
Subject: [EXTERNAL] RE: Proposed Jury Instructions

Thank you, Wilson. We will look at these and get back to you.

I see that our motion to dismiss the indictment based on the Essayli appointment and appropriations issues has been transferred to a district judge from Hawaii. If the motion is successful and Essayli is found to be improperly appointed, all actions taken by him and/or his supervisees could be declared null and void. It would seem that the appointment/appropriation issues should be decided completely before we continue to litigate the case up to and through trial. For that reason, we were thinking that we could file a stipulation or ex parte asking Slaughter to stay the proceedings pending the outcome of the Essayli litigation. What is your position on that issue? Do you want us to draft something? I would like to have something on file before the 9/18 MIL deadline and 9/22 deadlines on witness/exhibits/jury instructions etc.

Please let us know your thoughts.

Sincerely,

Amy

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From: Park, Wilson (USACAC) <Wilson.Park@usdoj.gov>
Sent: Friday, September 12, 2025 2:27 PM
To: amyejacks@sbcglobal.net; windsorlaw@gmail.com
Cc: Kim, Danbee (USACAC) <Danbee.Kim2@usdoj.gov>; Ng, Kellye (USACAC)
<Kellye.Ng@usdoj.gov>
Subject: Proposed Jury Instructions

Amy and Mark,

I've attached proposed jury instructions for the Rojas trial. I did my best to follow the format requested by Judge Slaughter in his 8/4/25 minute order (Dkt. 235).

If there are disputed instructions following our meet and confer, you can send me Word versions of your proposed instructions, and I'll merge them into the master version. I will also update the index to reflect any disputed instructions. Thanks.

Wilson

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<9.15.25 Proposed Joint Verdict Form.pdf>
<9.15.25 Proposed Statement of the Case.pdf>